

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
W.R. GRACE & CO., <i>et al.</i> ,) Case No. 01-1139 (JKF)
)
Debtors.) Jointly Administered
)
	Re: Docket No. 21544 and 6/22/09 Agenda Item No. 1

**CERTIFICATION OF COUNSEL REGARDING ORDER
ON PHASE II PRE-TRIAL PROCEEDINGS**

1. On June 22-23, 2009, the Court held proceedings regarding Phase I of the Debtors' Confirmation Hearing. As a result of those proceedings, the Court set certain new deadlines for the submission of materials prior to the Phase II Pre-Trial Hearing, re-set the date of the Phase II Pre-Trial Hearing and added additional dates, if necessary, for the Phase II Confirmation Hearing.
2. As a result of those proceedings, the Debtors prepared the attached Order Regarding Phase II Pre-Trial Proceedings wherein the new deadlines and new dates are outlined.
3. On Friday, June 26, 2009, Debtors' counsel circulated the attached draft Order to all Plan Objectors for their review and comment and asked that they respond by close of business on Monday, June 29, 2009 if they had any comments or objections to the Order.
4. Only one party contacted the Debtors with any comments/objections to the Order. This party was Dan Speights who represents Anderson Memorial Hospital. Mr. Speights did not have specific comments to the Order per se, but instead, requested the Debtors consider providing him an additional 7 days to file his Phase II Pre-Trial Brief, which under the Third Amended Case Management Order in this case, is due to be filed on July 17, 2009.

5. The Debtors informed Mr. Speights that they could not agree to any changes to the Case Management Order and any request for such changes would have to be addressed to the Court.

6. As a result, the Debtors respectfully request entry of the attached Order Regarding Phase II Pre-Trial Proceedings.

Dated: July 1, 2009

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